

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ **MAR 18 2013** ★

CHARLES WILLIAMS,
Plaintiff

LONG ISLAND OFFICE

COMPLAINT

-VS-

Jury Trial Demanded

VIACOM, INC
BET NETWORKS,
A&E TELEVISION NETWORKS,
I TUNES CORPORATE / APPLE COMPUTER INC.,
NETFLIX CORPORATE,
AMAZON CORPORATE,
A.SMITH & CO. PRODUCTIONS,
Defendants

**SEYBERT, J
BOYLE, M**

I. PARTIES:

Plaintiff:
CHARLES WILLIAMS
4 Naomi Court, Melville, NY 11747

Defendants:
VIACOM, INC. 1515 Broadway, NY 10036
BET NETWORKS, 555 W. 57th Street, New York, NY 10019
A&E TELEVISION NETWORKS, 235 E.45th Street, New York, NY 10017
I TUNES CORPORATE/APPLE COMPUTER INC, 10500 N. Anza Blvd, Cupertino, CA 95014
NETFLIX CORPORATE, 100 Winchester Circle, Los Gatos, CA 95032
AMAZON CORPORATE, 1200 12th Avenue, Ste. 1200, Seattle, WA 98144
A.SMITH & CO. PRODUCTIONS, 9911 West Pico Blvd, Ste 250, Los Angeles, CA 90035

II. JURISDICTION:

Is invoked pursuant to the Federal Rules of Civil Procedure, the Copyright Act of 1976, 17
USCA sec.101, Et. Seq., 28 USCA sec.1338, 1391

III. STATEMENT OF CLAIM:

On November 21, 2007, BET Networks aired an American Gangster story, season 2, episode 8 of the Plaintiff, detailing Plaintiff's life story, and continues to air same domestically, and in foreign territories. The title of the show is, "Chaz Williams Armed & Dangerous". The show is a bio- documentary, with Plaintiff casted as himself. The documentary also has photos of Plaintiff and his siblings as a child, and photos of Plaintiff's parents. The story includes Plaintiff's life experiences as a bank robber. This story treatment, is registered as a copyright

with the Library of Congress as PAu002378203, registration date February 16, 1999, and again as a story outline as TXu001032384 on May 23, 2002. Both have also been registered with the Writers Guild of America East. Plaintiff has received compensation in the past from a film production company for an option to Plaintiff's life story rights. Subsequently, it was aired on A&E Television Networks, and continues to air. Plaintiff's story also appears in print on the Biography Channel website which is controlled by A&E Television Networks. Viacom controls these and other Networks known and unknown to Plaintiff who have aired and profited off Plaintiff's story and copyright. Recently, Netflix has placed Plaintiff's story for profit in its system. Both iTunes and Amazon have Plaintiff's story on their websites for sale. A.Smith & Company Productions produced and filmed the story. All of the aforementioned Defendants have made a profit, or has presented for profit Plaintiff's story domestically and internationally and have not compensated Plaintiff for his life story or Plaintiff's owner rights. Defendants have been unjustly enriched by use of Plaintiff's story, who is the sole owner of his copyright and trademark. Defendants by their actions individually and in concert have participated in unfair business practices, exploitation without compensation, and infringement. Plaintiff has not received any compensation and/or royalties for the continued airing of Plaintiff's story domestically, and internationally. All Defendants, known, and unknown, committed each infringement with the knowledge that the program they were and are displaying and making available to the public is subject to copyright restrictions, and they are enjoying the benefits of Plaintiff's story without paying for it. Plaintiff has had numerous meetings with film studios and production companies to sell life story rights and have been hindered adversely by Defendants actions. Finally, Plaintiff has been approached and harassed, on hundreds of occasions, in public after being recognized due to Defendants actions.

IV. RELIEF:

Plaintiff seeks twenty million, five hundred, thousand dollars (\$20,500,000) in punitive and compensatory damages:

VIACOM, INC- Ten million dollars (\$10,000,000)

BET NETWORKS – Five million dollars (\$5,000,000)

A&E TELEVISION NETWORKS – Three million dollars (\$3,000,000)

ITUNES CORPORATE/APPLE COMPUTER INC – Five hundred thousand dollars (\$500,000)

AMAZON CORPORATE – Five hundred thousand dollars (\$500,000)

NETFLIX CORPORATE – One million dollars (\$1,000,000)

A.SMITH & CO. PRODUCTIONS – Five hundred thousand (\$500,000)

And any further relief the Court may deem just and proper.

Date: March 15, 2013


CHARLES WILLIAMS, Plaintiff
646.527.3618

CV-13 1459

CERTIFICATE OF SERVICE

CHARLES WILLIAMS,

Plaintiff

-VS-

VIACOM, INC.

BET NETWORKS

A&E TELEVISION NETWORKS

I TUNES CORPORATE/APPLE COMPUTER INC

NETFLIX CORPORATE

AMAZON CORPORATE

A.SMITH & CO. PRODUCTIONS,

Defendants

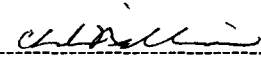
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LONG ISLAND OFFICE

SEYBERT, J
BOYLE, M

I, Charles Williams, hereby certify that all of the above defendants have been served the complaint in the above captioned matter by certified mail thru the United States Postal Service on March 18, 2013.


Charles Williams, Plaintiff

SWORN TO BEFORE ME, THIS 17 DAY, OF MARCH, 2013

CYNTHIA SERRANO
Notary Public, State of New York
No. 01SE6191261
Qualified in Suffolk County
Commission Expires Aug 11 2014

